

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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HOBBY LOBBY STORES, INC,

Plaintiff, :

- against - :

DIRK D. OBBINK,

Defendant. :

Civil Docket No. 21-CV-3113

**AFFIDAVIT OF STEVE  
GREEN IN SUPPORT  
OF PLAINTIFF'S MOTION TO  
TRANSFER VENUE**

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STEVE GREEN, being duly sworn, deposes and says:

1. I am the President of Plaintiff Hobby Lobby Stores, Inc. ("Hobby Lobby"). I am fully familiar with the facts set forth in this affidavit, which I make in support of Hobby Lobby's motion to transfer this action from the United States District Court for the Eastern District of New York ("EDNY") to the United States District Court for the Western District of Oklahoma ("WDOK").

2. This case stems from seven private sale agreements between Hobby Lobby, as the buyer, and Defendant Dirk D. Obbink ("Obbink"), as the seller, executed between February 2010 and February 2013, under which Hobby Lobby purchased papyri fragments, along with other ancient objects, from Obbink (the "Purchases") for approximately \$7,095,100.

3. Hobby Lobby is a private company headquartered in Oklahoma City, Oklahoma, located in the WDOK, and operates over 950 arts, crafts, hobbies, and home accent stores throughout the United States.

4. In 2009, Hobby Lobby began acquiring artifacts and manuscripts related to the Bible. I was first introduced to Obbink in 2009. I came to understand that he was a Lecturer in Papyrology and Greek Literature in the Faculty of Classics at the University of Oxford ("Oxford University") and was the General Editor of the Oxyrhynchus Papyri at the Egypt Exploration Society, the custodian of

the largest collection of ancient papyri in the world, including those from the Grenfell and Hunt excavations in the late nineteenth and early twentieth centuries at the site of Oxyrhynchus, Egypt, and housed at Oxford University. I learned that Obbink was not only one of the world's leading scholars of ancient papyri, but also was, throughout his career, a private dealer of papyri fragments and other antiquities to the world's greatest museums and private collectors.

5. In September 2010, I organized the Museum of the Bible, Inc., and Oklahoma non-profit corporation ("MOTB"), which now operates a museum focused on the Bible in Washington, D.C., and was acting as the Board Chairman of MOTB at the time of the Purchases. Many of the items in the Purchases were later donated by Hobby Lobby to MOTB.

6. I was primarily responsible for supervising and negotiating Hobby Lobby's Purchases from Obbink, which occurred between February 2010 and February 2013.

7. Obbink was also a paid consultant to Hobby Lobby as an independent contractor for two years between September 2010 and August 2012. Thereafter, Obbink became a paid consultant to MOTB.

8. Prior to his work as a consultant, Obbink travelled to Oklahoma City, Oklahoma on several occasions to meet with me and other Hobby Lobby employees to negotiate and consummate three of the Purchases (Purchases one through three).

9. During his consultancy with Hobby Lobby, Obbink travelled to Oklahoma City to attend meetings with me and other Hobby Lobby employees in Oklahoma City to discuss Hobby Lobby's acquisition of biblical artifacts. Three of the seven Purchases (Purchases four through six) were sold by Obbink to Hobby Lobby during his consultancy with Hobby Lobby.

10. During his consultancy with MOTB, Obbink continued to travel to Oklahoma City to attend meetings with me, other Hobby Lobby employees, and employees of MOTB in Oklahoma City to discuss Hobby Lobby's acquisition of biblical artifacts. The last of the seven Purchases (Purchases seven) was sold by Obbink to Hobby Lobby during his consultancy with MOTB.

11. I was assisted in the Purchases by my Executive Assistant, Marsh Bold ("Bold"), who was responsible for scheduling meetings with Obbink during his visits to Oklahoma City, coordinating correspondence with Obbink about the Purchases, and arranging for payments for the Purchases and their shipments to Oklahoma City.

12. I was also assisted in the Purchases by Debbie Cooper ("Cooper"), Hobby Lobby's Shipping Coordinator, who was responsible for handling the importation and delivery of shipments of the Purchases to Oklahoma City and their warehousing there.

13. Bold, Cooper, and I will be Hobby Lobby's main witnesses in this action. All three of us live and work in the WDOK and are not in the EDNY. In fact, all the current or former Hobby Lobby and MOTB employees who could be witnesses in this case live and work outside of the EDNY.

14. All the custodians of documents that could be used in this case live and work in the WDOK and not in the EDNY.

15. It is my understanding that Obbink, who was on the Faculty at Oxford University when the Purchases were made, worked as a consultant and private dealer from his office at Oxford University and from his private home in Oxford, England. To my knowledge, Obbink did not, during that time, maintain a residence or office in the EDNY.

Sworn to before me this  
21<sup>st</sup> day of November 2022

  
Notary Public



  
STEVE GREEN